

From: [Galloway, Stephen](#)
To: [Mike Brooks](#)
Cc: [Keating, Reilley](#)
Subject: RE: Brooks v. Agate Resources - Confidential Documents [SR-ACTIVE.FID3130539]
Date: Monday, December 21, 2020 11:12:14 AM

Mr. Brooks,

Please let us know when you are available to confer by phone on our motion. Otherwise, we will inform the Court that you declined to confer and we will file the motion as opposed.

Stephen H. Galloway | Of Counsel
STOEL RIVES LLP | 760 SW Ninth Avenue, Suite 3000 | Portland, OR 97205
Direct: (503) 294-9369 | Mobile: (503) 367-6832
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From: Mike Brooks <mibrooks@mac.com>
Sent: Monday, December 21, 2020 10:51 AM
To: Galloway, Stephen <stephen.galloway@stoel.com>
Cc: Keating, Reilley <reilley.keating@stoel.com>
Subject: Re: Brooks v. Agate Resources - Confidential Documents [SR-ACTIVE.FID3130539]

I destroyed those records as I told you and the Court. I have copies of records that were stolen on September 20, 2017, and returned to me that are evidence in a Supreme Court appeal. I have other records of Trillium selling patient records to employers, and secret records that are part of a federal investigation. I'm pretty sure that you and the local court cannot make broad claims about prohibiting me from ever whistleblowing or obtaining evidence of unlawful conduct by Centene and its executives. That seems to be what you are trying to claim. Since I am filing other papers with the Supreme Court right after Christmas, I will include your threats.

Mike Brooks

Sent from my iPhone

On Dec 21, 2020, at 10:40 AM, Galloway, Stephen <stephen.galloway@stoel.com> wrote:

Mr. Brooks,

On October 9, 2020, I sent you the attached letter demanding return of Agate Resources' confidential documents that you retained upon the termination of your employment in 2013. I did not receive a response to the letter. Agate is now preparing to file a motion in U.S. District Court to enforce the terms of the Protective Order (which is included with the attached letter) and compel the return of Agate's documents.

Per Local Rule 7-1(a), we are required to confer with you before filing the motion. Please let me know your availability between now and Wednesday for a brief phone call to discuss the return of Agate's documents.

Thank you.

Stephen H. Galloway | Of Counsel

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<2020.10.09 Agate - Letter to Brooks re PHI.pdf>

From: [Mike Brooks](#)
To: [Galloway, Stephen](#)
Subject: Re: Brooks v. Agate Resources - Confidential Documents [SR-ACTIVE.FID3130539]
Date: Monday, December 21, 2020 11:18:23 AM

destroyed those records as I told you and the Court. I have copies of records that were stolen on September 20, 2017, and returned to me that are evidence in a Supreme Court appeal. I had other records of Trillium selling patient records to employers, and secret records that are part of a federal investigation. I'm pretty sure that you and the local court cannot make broad claims about prohibiting me from ever whistleblowing or obtaining evidence of unlawful conduct by Centene and its executives. I have no idea if what records would even be included with your gag order. Please provide a detailed list of items you claim as "privileged".

Since I am filing other papers with the Supreme Court right after Christmas, I will include your threats. None of the current records are or have anything to do with the Qui Tam claims London, Leiman, Johnson, and Dugan were claiming in their suit, so I am not T all sure what you are even talking about.

Mike Brooks

Sent from my iPhone

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